



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

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DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

December 26, 1984

Mr. Frank Brown
Maintenance & Engineering Supervisor
Chrysler Corp. Chemical Division
5437 W. Jefferson
Trenton, MI 48183

RE: MID 005358049

Dear Mr. Brown:

On December 18, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 5437 W. Jefferson, Trenton, Michigan. The purpose of that inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of Subtitle C of RCRA. Specifically, the following was found:

1. Seven drums in your drum storage area were stored for more than 90 days. You are limited to a maximum accumulation time of 90 days as required by 40 CFR 262.34(a).
2. Personnel training documentation does not include the name of each employee filling each position at the facility related to hazardous waste management, a written job description for each of these positions, nor a description of the required training that will be given to each person filling these positions, as required by 40 CFR 265.16(d)1,2, and 3.
3. Your records of training do not specify what training was given to the persons listed on these records as required by 40 CFR 265.16(d)4.
4. It could not be determined by review of your training documentation whether or not new personnel have received the required training within six months, as required by 40 CFR 265.16(b).
5. You are required to test and maintain facility alarm systems, fire protection equipment, and spill and decontamination equipment as required by 40 CFR 265.33. Although you stated that this is done, you are requested to provide to this office documentation of this testing and maintenance.

US EPA RECORDS CENTER REGION 5



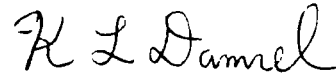
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6. Though not citing these as a deficiency of RCRA, it was suggested at time of our inspection that enough aisle space be maintained inside the drum storage area to allow easier access. Also, your contingency plan appears outdated and should be revised.

You are requested to respond to this letter by January 21, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,



Kenneth Lee Damrel
HAZARDOUS WASTE DIVISION

cc: U.S. EPA, Region V
B. Okwumabua